

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD., <i>et al.</i>,	:	Case No. 24–10070 (BLS)
	:	
Debtors.¹	:	(Jointly Administered)
	:	
	:	
	X	

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING
STIPULATION EXTENDING GOVERNMENTAL BAR DATE FOR THE
U.S. SECURITIES AND EXCHANGE COMMISSION**

The undersigned hereby certifies as follows:

1. On January 21, 2024 and July 1, 2024, as applicable, debtors Terraform Labs PTE. Ltd. (“**TFL**”) and Terraform Labs Limited (“**TLL**,” and together with TFL, the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of title 11 (as amended, the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. By order entered July 9, 2024 (Docket No. 437) (the “**Bar Date Order**”), the Court set August 9, 2024 (the “**TFL Governmental Bar Date**”) as the deadline by which a governmental unit, as defined in section 101(27) of the Bankruptcy Code, must file proofs of claim against TFL in these chapter 11 cases. The U.S. Securities and Exchange Commission (“**SEC**”) is a governmental unit within the meaning of the Bankruptcy Code. *See* 11 U.S.C. § 101(27).

¹ The Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Debtors’ principal offices are located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

3. The SEC has requested out of an abundance of caution, and the Debtors have consented to, subject to the approval of the Court, an extension of the TFL Governmental Bar Date for the SEC to November 1, 2024.

4. The Debtors and the SEC have engaged in discussions regarding the form of consensual agreement to extend the TFL Governmental Bar Date for the SEC, and have entered into the *Stipulation Extending Governmental Bar Date for the U.S. Securities and Exchange Commission* (the “**Stipulation**”). The Stipulation is attached as **Exhibit 1** to the proposed form of order approving the Stipulation (the “**Proposed Order**”), which is attached hereto as **Exhibit A**.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, at the earliest convenience of the Court.

Dated: August 8, 2024
Wilmington, Delaware

/s/ Matthew P. Milana

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